

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

CSX TRANSPORTATION, INC.,
individually and on behalf of NORFOLK
& PORTSMOUTH BELT LINE
RAILROAD COMPANY,

Plaintiff,

v.

Civil Action No. 2:18cv530

NORFOLK SOUTHERN RAILWAY
COMPANY, NORFOLK & PORTSMOUTH
BELT LINE RAILROAD COMPANY,
JERRY HALL, THOMAS HURLBUT,
PHILIP MERILLI, and CANNON MOSS,

Defendants.

**PLAINTIFF CSX TRANSPORTATION, INC.'S
INITIAL SEARCH TERMS**

Search Term List:
NPBL*
Belt line*
Beltline*
Dray* AND (analy* or project* or estimat* or rat* or stud*)
Dray* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"trucking services" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Volume* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Capacit* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"switch rate*" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"switch service*" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"Norfolk Southern" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
NS* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"vertical clearance" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"double stack" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"on dock rail" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
"near dock rail" AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)
Track* AND (Virginia or "Hampton Roads" or VA or NIT or VIG or PMT)

(Intermodal OR “Inter modal”) AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Terminal* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Port* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Freight* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“service proposal” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“rate proposal” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Maersk AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“CMA CGM” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
(MSC OR “Mediterranean Shipping Company” OR “Med Shipping” OR “Mediterranean Shipping Co”) AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Hapag Lloyd” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Ocean Express” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Evergreen AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“Yang Ming” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Hyundai AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Zim AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
“China Shipping” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Cosco AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Hanjin AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Diamond*
“Pinner’s Point”
“Portlock Yard”
“Carolina Juncture”
“NS Juncture”
“N&W” AND “Southern Railway”
“interline switch settlement”
“Commonwealth Railway”
“Commonwealth Rail”
“2010 Proposal”
“2018 Proposal”
Heartland
Jerry AND Hall
Hurlbut
Cannon AND Moss
Merilli
“1897 Operating Agreement”
Market* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Compet* AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)
Tariff*
“spot market”
Perdue
“short line” AND (Virginia or “Hampton Roads” or VA or NIT or VIG or PMT)

CSXT v. NSR et al.
No. 2:18-cv-00530-MSD
NSR Search Terms
November 26, 2019

1. (beltline OR NPBL OR "belt line") AND NOT Chicago
2. ("Virginia International Terminal*" OR "Virginia Port Authority" OR VIT OR VPA OR "*virginia.gov") AND (CSX* OR (switch w/5 (fee* or rate*)))
3. CSX* w/50 ((2010 OR 2018) w/10 rate*)
4. (beltline OR NPBL OR "belt line") AND (diamond OR ((milepost or "mile post") w/10 ("1.40" OR "2.30")))
5. (beltline OR NPBL OR "belt line") w/20 audit*
6. (beltline OR NPBL OR "belt line") AND ("*csx.com" OR CSX*)
7. (beltline OR NPBL OR "belt line") AND (STB OR "Surface Transportation Board" OR (surface w/5 board))
8. (beltline OR NPBL OR "belt line" OR CSX*) w/50 ("Norfolk International Terminal" OR "Portsmouth Marine Terminal" OR "Virginia International Gateway" OR "Virginia International Terminal*" OR "Virginia Port Authority" OR NIT OR PMT OR VIT OR VPA)
9. "*gwrr.com" AND (switch w/5 (fee* OR rate*))

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NORFOLK AND PORTSMOUTH BELT LINE
RAILROAD COMPANY,**

Plaintiff,

v.

Civil Action No. 2:18-cv-530-MSD-LRL

**NORFOLK SOUTHERN RAILWAY
COMPANY *et al.*,**

Defendants.

**NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY'S
PROPOSED SEARCH TERMS**

- | | |
|---------------------|------------------------|
| 1. Tariff | 11. Board meeting |
| 2. Switch rate | 12. Shareholder |
| 3. Rate committee | 13. Minutes |
| 4. Uniform rate | 14. Agenda |
| 5. Intraplant | 15. Diamond |
| 6. Discount | 16. Service agreement |
| 7. Trackage rights | 17. Locomotive Lease |
| 8. Rate proposal | 18. CSX and Locomotive |
| 9. Service proposal | 19. NS and Locomotive |
| 10. Joint Facility | |